

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

v.

ALKIS NAKOS

Cr. No. 14-CR-0093-01-LM

ASSENTED-TO MOTION TO EXCEED PAGE LIMIT *NUNC PRO TUNC*

NOW COMES, the Defendant, Alkis Nakos, by and through his counsel, Wilson, Bush, Durkin & Keefe, P.C., and requests that this Honorable Court allow the Defendant's Sentencing Memorandum and Motion for *Booker* Variance to exceed the allowed 25-page limit. In support thereof, the Defendant states as follows:

1. The Defendant through counsel is filing a Sentencing Memorandum and Motion for *Booker* Variance this date.
2. The pleading exceeds the allowed 25-page limit, and the Defendant is seeking the Court's approval for his Sentencing Memorandum and Motion for *Booker* Variance to exceed the 25-page limit.
3. The Defendant has pled guilty to a very serious crime and is facing a substantial amount of incarcerated time. Undersigned counsel needs to exceed the 25-page limit in order to present all necessary arguments in support of the Defendant's requested sentence.
4. Donald Feith, Esquire, of the U.S. Attorney's Office has been contacted and assents to this Motion to Exceed Page Limit.

WHEREFORE, the Defendant prays for the following relief:

- A. That the Court allow the Defendant's Sentencing Memorandum and Motion for *Booker* Variance to exceed the allowed page limit of 25 pages;
- B. For such other relief as the Court deems just.

Respectfully submitted,

Alkis Nakos
By and through his counsel,

DATED: May 31, 2016

/s/Charles J. Keefe
Charles J. Keefe (N.H. Bar No. 14209)
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Certificate of Service

I, Charles J. Keefe, hereby certify that on May 31, 2016, a true copy of the above document was to AUSA Donald Feith, as well as the United States Probation Office via ECF.

/s/Charles J. Keefe
Charles J. Keefe